

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10068 (CTG)

(Jointly Administered)

Re: Docket No. 929

**CERTIFICATION OF COUNSEL REGARDING FIFTH NOTICE OF
ASSUMPTION AND ASSIGNMENT OF CERTAIN EXECUTORY
CONTRACTS AND/OR UNEXPIRED LEASES**

The undersigned counsel to JOANN Inc. and certain of its affiliates, the debtors and debtors in possession in the above-captioned cases (collectively, the “Debtors”), hereby certifies as follows:

1. On May 16, 2025, the Debtors filed the *Fifth Notice of Assumption and Assignment of Certain Executory Contracts and/or Unexpired Leases* [Docket No. 929] (the “Fifth Assumption Notice”) regarding the assumption and assignment of certain unexpired leases set forth in the Fifth Assumption Notice (the “Original Assumption List”). Attached to the Fifth Assumption Notice was a proposed form of order (the “Assumption Order”) authorizing the assumption and assignment of the Original Assumption List.

2. The deadline to object to the Fifth Assumption Notice was May 30, 2025 (the “Objection Deadline”).

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors' mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

3. The landlords of Store Nos. 2194 and 2314 agreed to revise the proposed cure amounts listed in the Fifth Assumption Notice pursuant to an agreement between such landlords and the proposed assignee, Dollar Tree Stores, Inc. (“Dollar Tree”).

4. The Debtors did not receive any objections or informal comments from the landlords of Store Nos. 1044, 2394 or 2497, which were each included in the Original Assumption List.

5. Attached hereto as **Exhibit A** is a revised proposed order (the “Revised Assumption Order”) assigning certain of the leases listed on the Fifth Assumption Notice to Dollar Tree. A redline comparing the Revised Assumption Order to the Assumption Order is attached hereto as **Exhibit B**.

6. Any leases subject to unresolved objections and informal comments received regarding the remaining balance of the leases included in the Fifth Assumption Notice (collectively, the “Outstanding Leases”) are not included in the Revised Assumption Order. For the avoidance of doubt, the Fifth Assumption Notice remains pending, and has not been withdrawn, with respect to the Outstanding Leases. To the extent that the Debtors and the relevant landlords reach agreement with respect to any Outstanding Lease, the Debtors will submit a proposed form of order with respect to such lease.

7. Accordingly, the Debtors request entry of the Revised Assumption Order attached hereto as **Exhibit A** at the Court’s earliest convenience.

[Remainder of page intentionally left blank.]

Dated: June 16, 2025
Wilmington, Delaware

/s/ Jack M. Dougherty

COLE SCHOTZ P.C.

Patrick J. Reilley (No. 4451)
Stacy L. Newman (No. 5044)
Michael E. Fitzpatrick (No. 6797)
Jack M. Dougherty (No. 6784)
500 Delaware Avenue, Suite 600
Wilmington, Delaware 19801
Telephone: (302) 652-3131
Facsimile: (302) 652-3117
Email: preilley@coleschotz.com
snewman@coleschotz.com
mfitzpatrick@coleschotz.com
jdougherty@coleschotz.com

*Co-Counsel to the Debtors
and Debtors in Possession*

KIRKLAND & ELLIS LLP

KIRKLAND & ELLIS INTERNATIONAL LLP

Joshua A. Sussberg, P.C. (admitted *pro hac vice*)
Aparna Yenamandra, P.C. (admitted *pro hac vice*)
601 Lexington Avenue
New York, New York 10022
Telephone: (212) 446-4800
Facsimile: (212) 446-4900
Email: joshua.sussberg@kirkland.com
aparna.yenamandra@kirkland.com

- and -

Anup Sathy, P.C. (admitted *pro hac vice*)
Jeffrey Michalik (admitted *pro hac vice*)
Lindsey Blumenthal (admitted *pro hac vice*)
333 West Wolf Point Plaza
Chicago, Illinois 60654
Telephone: (312) 862-2000
Facsimile: (312) 862-2200
Email: anup.sathy@kirkland.com
jeff.michalik@kirkland.com
lindsey.blumenthal@kirkland.com

*Co-Counsel to the Debtors
and Debtors in Possession*